

# EXHIBIT 21

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1 **Call Date:**2018-09-29

2 **Call Duration:** 13:40

3 **Call Begin:** 15:24:23

4 **Participants:**

5 John Wilson

6 Rick Singer

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10

11 WILSON: Hey, Rick.How ya doin'?

12 SINGER: Hey, John.How are ya?

13 WILSON: Good. You feelin' better?

14 SINGER: Lot better.

15 WILSON: Oh, [OV/UI].

16 SINGER: [UI] good? You been out of town?

17 WILSON: Yeah, I've been out of town. Been traveling.I'm

18 goin' to Europe next week, so it'll be easier to

19 connect this week, so...

20 SINGER: OK, cool. So the girls --

21 WILSON: [OV] So, yeah --

22 SINGER: -- were great.

23 WILSON: Cool. I, I still didn't get a c-- a f-- a full

24 debrief from 'em, but talked to Leslie. They, um,

United States District Court  
District of Massachusetts

TRIAL EXHIBIT

**571A**

Case No. 19-CR-10080-NMG

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1           they have any clarity on, uh, on where they want to  
2           go, what majors, or still--  
3 SINGER:   [OV] Yeah. Yeah, well, I mean, you have done a great  
4           job of, uh -- [laughter] it's so funny - influencing  
5           'em on what is the appropriate path to go down. What  
6           do you  
7           think they both said?       [OV/IA]  
8 WILSON:   What, all the Ivy League schools?  
9 SINGER:   No, no, I mean -  
10 SINGER:   -- uh, uh, uh, they wanna be business and  
11           engineering. [laughter] I said, "So do..." I said,  
12           "does that come from your dad?" And, of course,  
13           "Well, my dad--they pro--my dad's programmed us,"  
14           right? [laughter] So, I said, "That's cool. So we  
15           can make all that happen." I said, "You think you  
16           might like that?" They said, Well, my dad says we  
17           will, so..."  
18 WILSON:   [laughter] Come on! I thought they actually liked  
19           science and engineering. They [UI]--  
20 SINGER:   [OV] No, I'm sure they -  
21 WILSON:   -- science.  
22 SINGER:   -- I -- but you're -- you've influenced them, right?  
23 WILSON:   Yeah, I've influenced 'em, but I want 'em to pick  
24           what they like.

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1 SINGER: No, they're gonna <sup>to</sup> pick--they get it, they get it,  
2 Right? And it's just --  
3 WILSON: Yeah.  
4 SINGER: -- it's just funny, 'cause then when Leslie kinda  
5 interjected they're like, "Mom, stay out of it.  
6 Mom, stay out of it." Right? It was funny. Um,  
7 but they're both obviously great girls. They want -  
8 in a lot of ways, they want to have the, kind of the  
9 same kinds of things from the school. We, um - I  
10 have a huge list of schools for them. Um, you know,  
11 and, and I said, "You guys gotta  
12 send me dates, because you both go to 2 separate  
13 schools, and Lynnfield and then -- and Andover,  
14 different dates of days off. So Leslie's gonna be  
15 runnin' all over the place tryin' to figure out how  
16 to get 1 over here for a day, and over here."  
17 WILSON: Yeah.  
18 SINGER: But, uh, that's why I need to know your dates, so I  
19 can figure out where to go visit that would be best  
20 suited.  
21 WILSON: Right. Now, would they go on weekends, or better to  
22 go during school days [UI]?  
23 SINGER: You gotta go on a school day, or, or a day when it's  
24 a school day but they're off of school.

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1 WILSON: Yeah, OK.

2 SINGER: That's the ideal situation, 'cause --

3 WILSON: [OV] That's gonna be tougher, yeah. But the ideal

4 isn't just seeing the campus on a weekend?

5 SINGER: Yeah, 'cause I gotta get to a point where we know if

6 we're applyin' ED or where we're goin', what we want,

7 'cause you're gonna wanna know first choice, second

8 choice, all that stuff.

9 WILSON: Yeah, no, exactly. And just so I'm, I'm clear on

10 the, the kinda pecking order schools, and UCLAs and

11 all that stuff versus -- uh, I think you said UCLAs

12 mostly are in the, the bracket of, um, like, uh,

13 Stanford - or not Stanford, but like, uh, USC and so

14 forth. And what were the schools in that, if you did

15 the side door? And I'm interested about the side door

16 and that stuff, um -

17 SINGER: So the side door is gonna be -- gonna happen where

18 you want 'em to happen--

19 WILSON: It can happen anywhere? Does it have to be a sports

20 side door? I wasn't clear on that.

21 SINGER: Well, so that's the -- that's the easiest way to

22 approach it, right -

23 WILSON: Yeah.

24 SINGER: -- because all of the coaches have... You know,

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1           they have guaranteed spots, and you've done a good  
2           job, you got athletic girls who got great size,  
3           they're in the right sports, so, you know,  
4           potentially there's a sailing option, and potentially  
5           there's a crew option. I mean, I don't know how  
6           good of athletes they are. They may be good enough  
7           to be able to compete at some of these schools, and  
8           then who knows what we have to do, depending  
9           on where, where the spots are.

10 WILSON: M-hum. Yeah, so they --

11 SINGER: [OV] So you have --

12 WILSON: -- have to get that sports. Uh, what if they're not  
13           really that good? I mean, they can do some crew,  
14           but I don't know they're gonna be good. Courtney's  
15           not even that good competitively at sailing. She just  
16           taught sailing and did sailing in, you know, [UI] --

17 SINGER: [OV] Right, so --

18 WILSON: -- [OV] Yacht Club.

19 SINGER: But at the end of the day, by the side door, I may  
20           be able to go to the sailing coach and say, "Hey,  
21           this family's willing to make the contributions. She  
22           could be on your team. She is a sailor. She may  
23           not be up to the level you are, but she can comp--you  
24           know, you're gonna get a benefit, and the family's

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1                   gonna get benefit. So are you will-- are you  
2                   interested in doing that?"

3   WILSON:       Yeah. OK.       And just -- but -- and what's the  
4                   other side door? If it's not a sport, what is it?  
5                   Is there any other side doors in --

6   SINGER:       Then I have to go to -- then I have to go to the  
7                   department chairs, and, and, and get - Some  
8                   schools have a VIP list at the department chair  
9                   level, so we can go that route, and then you can  
10                  help their program--their, their program. It just  
11                  depends on which school you want to go to.

12 WILSON:       OK, [UI], I have this friend -- you know, one of  
13                  the things I wanted to talk to you about, too, is I  
14                  -- I don't know how -- I remember last time I did  
15                  this, you didn't really make any money on this, on  
16                  the side, this stuff. You just charge, and then  
17                  you make a donation to the school, and that's it?

18 SINGER:       Well, uh, so it depends in different ways. So  
19                  what's happened in the grown-up world of my world  
20                  now, compared to when, you know, we did Johnny, was  
21                  that essentially now the money goes into my  
22                  foundation, as a donation -

23 WILSON:       Oh, to your foundation, not to the schools.

24 SINGER:       Yeah, then that way the kids don't know it happens,

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1 right?  
2 WILSON: Yeah.  
3 SINGER: So -- and then the other part of that is they don't  
4 chase you all the time for money. 'Cause once  
5 you -- you know, once you're -- they know you gave  
6 money, it's a different story. And then what I can --  
7 what I'll do is I'll split the money potentially to  
8 the coach or other pl-- parties that are at that  
9 school that need the money, right?  
10 WILSON: M-hum.  
11 SINGER: So - Or it may go right to the coach, um, that's  
12 helping us. It ju-- it just depends on the school.  
13 WILSON: Right. OK, so you don't actually get credit for a  
14 donation to the school, or get hounded for that. You  
15 get, uh --  
16 SINGER: [IA]  
17 WILSON: -- your donation to you, or your foundation, the Key  
18 or whatever --  
19 SINGER: Right, and you get --  
20 WILSON: -- that, uh -- and --  
21 SINGER: -- your write-off, and then you do your thing.  
22 WILSON: OK.  
23 SINGER: And then the kids get in the school.  
24 WILSON: So my colleagues -- so, so you c-- you, you



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1           [inaudible] I assume take a share of that or  
2           something. If it's all going to your foundation, you  
3           can't take a share if it goes to your foundation. You  
4           don't get a fee on that, then?

5 SINGER:   Um, I just do my fee for what I take when I do your  
6           normal applications.

7 WILSON:   Yeah, that's, like, terrible. I, I think, from a  
8           business model point of view, again, I advised you  
9           last time, [laughter] I still advise you, this is  
10          worth a lot to people, and so, you know, to the  
11          extent you want to make more money, I would think you  
12          would have some kind of fee for that.   It's about...  
13          uh, it's 350 to the foundation, plus another 20% for  
14          me for using my leverage and my relationships --

15 SINGER:   Yeah.

16 WILSON:   -- or something, no?

17 SINGER:   Well, I'm, I'm gonna use your business model going  
18          forward.

19 WILSON:   I think you should. I, I really would advise you...  
20          But anyway, I -- so then I have this, uh, close  
21          friend of mine here who works at, uh, McKinsey with  
22          me, and he's very well off.   He's the head of, uh,  
23          one of these big areas in McKinsey for a lot of  
24          years. And his daughter's

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1           -- wants to go to Brown next year. His concern [UI]  
2           said, "Well, have you thought about...?"       It may  
3           be too late, 1. I don't know. Um, she's going through  
4           her senior year right now.  
5 SINGER:   Well, what's the relationship that that person would  
6           have...? I mean, is that g-- is that person big  
7           enough in McKinsey that people would know who that  
8           person is?  
9 WILSON:   Uh, yeah, probably.  
10 SINGER:   OK, so then here would be my suggestion, to be frank  
11           with you --  
12 WILSON:   OK.  
13 SINGER:   -- and I'd love to help -- you know, it is late and  
14           all of that. The president takes meetings all the  
15           time from influential people. She's a good gal. And  
16           she--  
17 WILSON:   Of Brown? Yeah, I don't know.  
18 SINGER:   Yeah, at Brown. So what I would suggest is that,  
19           um, he calls up her office -- they have a  
20           scheduling person for the president -- and he sets up  
21           a meeting for he and his daughter to go meet, and she  
22           kinda meets with them, and then she'll give an  
23           indication, and he'll get an idea of what it's gonna  
24           need -- what's gonna need to be done to, to have her

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1 to go to Brown. That's --  
2 WILSON: [OV/IA] the front door -  
3 SINGER: -- that's the path I would go.  
4 WILSON: -- like, like, \$10,000,000 kind of thing? Or  
5 that'd be the-  
6 SINGER: [OV] No, no, no, I think it's a lot less than that.  
7 I think it's a lot less than that. But, um, but it's  
8 first getting the meeting with the president, and  
9 just talkin' about -- and then also what he could do  
10 for the university, not only financially but, you  
11 know, just in - he could be a, a guest lecturer. He  
12 could do, you know, lots of different things.  
13 WILSON: Uh-huh.  
14 SINGER: That would be my suggestion at this point  
15 WILSON: He wanted to do it -- so the, the other thing he had  
16 a concern was he wanted to do it in a way his  
17 daughter wouldn't know. His daughter's already said,  
18 "Dad, don't help me with this, don't help me with  
19 that." She's very kind of, uh -  
20 SINGER: Well, then that's a different path, and then - then I  
21 may have to get involved in that. Um -  
22 WILSON: Right, so that's -  
23 SINGER: [OV] -- but, but it's really -  
24 WILSON: -- the only thing he's sensitive to.

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1 WILSON: His daughter's, like, really independent  
2 that way.  
3 SINGER: Right.  
4 WILSON: And she's very smart. She got a 35 or 31 below  
5 perfect --  
6 SINGER: [OV] But, but --  
7 WILSON: -- on the ACTs --  
8 SINGER: [OV] -- I --  
9 WILSON: -- and all that, but...  
10 SINGER: No, I get it, but it -- what I would do is I would  
11 still -- because them goin' to meet the president  
12 isn't -- doesn't mean that she's gonna help him, but  
13 that's a good starting point.  
14 WILSON: M-hum. Well, maybe I'll just connect you two by an  
15 email, and [UI] like that?  
16 SINGER: So --  
17 WILSON: Does that make sense?  
18 SINGER: So I can make the -- I can call the office, and then  
19 what they normally - So I just had a family do that,  
20 and essentially what they told me to do was just, um,  
21 have, have my family call the scheduling coordinator  
22 for time --  
23 WILSON: M-hum.  
24 SINGER: -- and, and -- with the background of the

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1 candidates, and then they'll, they'll usually set up  
2 the meeting. Sounds like this person's well - high  
3 enough up that it makes sense for [UI] --  
4 WILSON: [OV] Yeah, he's one of the top, let's say, 12  
5 people. He's on the Executive Board and all that  
6 stuff like that, so...  
7 SINGER: Yeah, yeah, so then that makes sense.  
8 WILSON: Now, he's, um... Let's see, what else? Uh,  
9 that's her f-- uh, what do you call it, early  
10 decision school, I think, and all that stuff?  
11 SINGER: Yeah.  
12 WILSON: So she's got all that -  
13 SINGER: Yeah.  
14 WILSON: -- stuff goin' for her. She really loves it, wants  
15 to get there and all that stuff, and he's willin' to  
16 pay a million, 2 million. He doesn't care. Um, so  
17 it's that--it's his last daughter, and he's, you know,  
18 pretty well off that way. I don't know what -- um, is  
19 Brown one of those 350 or million...?  
20 SINGER: Oh, it's in the millions. Yeah, yeah, yeah. No,  
21 there's no -  
22 WILSON: 2 million side door?  
23 SINGER: -- 350 [IA]...Yeah, there's no -- there's no  
24 [laughter] 350...I'll -- I would have a [IA] --

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1 WILSON: I thought that Stanford -- not Stanford -- I thought  
2 that UCLA and USC and stuff like that was [IA] --  
3 SINGER: [OV] Yeah, that's a different story. They're not  
4 Brown.  
5 WILSON: No, no, that's what I meant. The, the -- there's  
6 the 350 schools, or... [laughter]  
7 SINGER: Yeah. Yeah, exactly.  
8 WILSON: And everybody else jumps up to the million [UI],  
9 yeah?  
10 SINGER: Yeah, you gotta ante way up. Yeah, absolutely.  
11 WILSON: There's not much, uh -- not much in between. Uh,  
12 because last time [UI] it seemed like, just a,  
13 a bunch of them are 350s, the second tier or  
14 Whatever you wanna call 'em, and then everything  
15 else just jumped immediately to --  
16 SINGER: That's correct.  
17 WILSON: -- [IA] 1, 2.  
18 SINGER: W-- yeah.  
19 WILSON: There's no, like, 500 or 700 [UI] --  
20 SINGER: [OV] No, no.  
21 WILSON: -- or...?  
22 SINGER: No. No, because it makes no sense for them to get  
23 involved at those schools unless they're gonna  
24 really Get after. But in your case, with the

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1 girls, I may be able to negotiate, knock it down so  
2 that, you know, that's a lot for 2 and figure it out.  
3 WILSON: L-let's say, let's say they both wanted to go to,  
4 you know, Harvard or a Stanford, right? Obviously -  
5 is it much more difficult in Stanford versus  
6 Harvard, or Princeton?  
7 SINGER: No, same -- no, but it's the same --  
8 WILSON: Are they all the same?  
9 SINGER: They're all the same.  
10 WILSON: Yeah. If you wanted to do 2 at Harvard or 2 at  
11 Stanford...? Now, I'm an alumni at Harvard. I've  
12 Given some money, but not a lot. You know, I've  
13 given, you know, a few hundred grand or--  
14 SINGER: [OV/IA] Uh, well, uh, so we just need to strategize  
15 on how we're gonna -- where we're gonna go, where we  
16 wanna go, right? 'Cause I don't think the girls have  
17 any, any idea right now.  
18 WILSON: Yeah, no, I don't think... They would love to go  
19 To Stanford or Harvard. [UI] --  
20 SINGER: Sure.  
21 WILSON: -- she loves the school there, and loves the thought  
22 of it. Uh, Courtney loves Harvard, just from the  
23 Thought of it. I know she's said to her friends-Uh,  
24 I just listen to 'em talkin' to their friends, you

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1 know?

2 SINGER: Right.

3 WILSON: "Where would you like to go?"You hear that stuff.

4 It doesn't have my influence... It has my

5 Influence indirectly, and, of course, they have

6 these big, you know -- oh, that's a great school,

7 just the, the brand name in their minds, you know.

8 SINGER: Well, and again, most people don't think they can

9 get into Stanford so they don't even bring up

10 that name.

11 WILSON: Yeah, but they lived out there and they went -

12 SINGER: I know.

13 WILSON: --swimming in the waterfalls.

14 SINGER: Right.

15 WILSON: They Sohey know that -

16 SINGER: No, no, I totally get it. [laughter] I totally get

17 It. No, I get it.

18 WILSON: They know the routine, they lived there.

19 SINGER: Yeah.

20 WILSON: So those are the 2 that are on the top. I-it's, it's

21 the strategy to try to get into those 2. Um, is

22 Harvard easier 'cause I'm a-

23 SINGER: No, it's not that.

24 WILSON: -- legacy?



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1 SINGER: [OV] But --  
2 WILSON: That doesn't mean shit?  
3 SINGER: Your legacy means 0, because... [laughter]  
4 WILSON: That's true for most of my life, you know.  
5 SINGER: John, [OV/IA] --  
6 WILSON: Unless you're donating a building, huh?  
7 SINGER: You've done quite well for yourself, so for a guy  
8 that has no legacy, you're OK. [laughter]  
9 WILSON: Oh, shit. So legacy doesn't help at all, huh?  
10 SINGER: Unless you're a big legacy, but you --  
11 WILSON: Especially a big donor legacy, huh?OK.  
12 SINGER: -- you haven't -- you haven't done that yet.  
13 WILSON: OK, I see.That's interesting. So that doesn't  
14 matter. Um --  
15 SINGER: Like, what's your -- like, how much do you give to  
16 Harvard?  
17 WILSON: Nothing. Like, a couple hundred grand over the  
18 years, so...  
19 SINGER: OK. [laughter]  
20 WILSON: So they have too much money. It pisses me off every  
21 time they ask for money. I say, sure, I'll give you  
22 10 grand, you know. Stop botherin' me.  
23 SINGER: No, I get it. I get it.  
24 WILSON: The fuckin' endowment's \$30,000,000,000. Like, are you

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1                   shitting me? [laughter]  
2   SINGER:    I know.    I know, I know, I know.    I know, I get it.  
3                   I get it.  
4                   I'd rather  
5   WILSON:    [IA] give to, you know, other charities. But anyway,  
6                   that's a -- that's a whole different story. But i-is  
7                   it --  
8   SINGER:    [OV] So --  
9   WILSON:    -- a better strategy to try and split 'em across the  
10                  2 -  
11   SINGER:    [OV] Oh, yeah, I got [IA] strategies -  
12   WILSON:    -- try to get 'em to go to 1.  
13   SINGER:    -- I'm gonna...No, I'm gonna use athletics to help  
14                  you, because that's the easiest way.  
15   WILSON:    'Cause they're pretty tall and strong, and I think  
16                  they could actually...    I mean, when I saw Courtney  
17                  rowing -  
18   SINGER:    I know, no, they're good athletes.  
19   WILSON:    When I saw Mamie -  
20   SINGER:    [OV] Yeah.  
21   WILSON:    -- row on fuckin' that crew machine, I thought she  
22                  was gonna break the machine, she was goin' so hard.  
23   SINGER:    No, she -- no, th-they en-- they, they may end up  
24                  gettin' in without even a donation, but, but you -  
                you'll know at least this route, we got an --

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1 WILSON: They gotta get erg scores [UI] --  
2 SINGER: -- [OV] we got the side door route, too.  
3 WILSON: -- [OV] first though, right?  
4 SINGER: Yeah, yeah.  
5 WILSON: But they're not really playing crew much. They're  
6 not doing crew, rowing crew.  
7 SINGER: Right. get in there and give a try  
8 WILSON: So you gotta [UI].  
9 SINGER: So we'll, we'll, we'll figure it out. So --  
10 WILSON: [OV] But what would it be, if they wanted to go to  
11 One, Uh, is that -- it's gonna be 2 and a half  
12 [OV/UI]--  
13 SINGER: It's gonna be 1 -- it -- normally it's 1, 2 each,  
14 right? So I would have to make a deal if you wanted  
15 'em both at the same school, and if they could even  
16 take 'em at the same school, and it would cost you -  
17 it'd cost you a couple million dollars. Big guy like  
18 you, [laughter] that's easy.  
19 WILSON: Yeah. Not so easy on liquidity, but yeah,  
20 [laughter]. You got the installment plan? [UI].  
21 SINGER: [laughter] You're the best. Listen, I gotta go to  
22 an a--another appointment. I just wanted to make  
23 sure I got back to you. I'm gonna be spending some  
24 time in Boston,

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1                   because I'm gonna be reading in Harvard this year,  
2                   So I'll be able to get together with you.  
3   WILSON:    Oh, I'd love that. That'd be great.     And I'm  
4                   Gonna connect you -- I'll just [UI] -- I'll send an  
5                   email to you, and the guy's name is Jon Garcia, and-  
6   SINGER:    OK.  
7   WILSON:    -- he could become a client and do whatever, and  
8                   I'll let the 2 of you kinda email back and forth and  
9                   stuff.     He'd love to do something not known to his  
10                  daughter at Brown.  
11   SINGER:    Got it.  
12   WILSON:    [laughter] And he's got money [laughter].  
13   SINGER:    I gotcha. I gotcha.  
14   WILSON:    OK.  
15   SINGER:    All right.     Take care.  
16   WILSON:    All right, take care.     Bye.  
17   SINGER:    OK, bye-bye.

END OF AUDIO FILE